

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JOEL VANGHELUWE, ET AL.,	§	
	§	2:18-cv-10542-LJM-EAS
Plaintiffs,	§	
v.	§	Hon. Laurie J. Michelson
	§	
GOTNEWS, LLC, ET AL.,	§	Mag. Elizabeth A. Stafford
	§	
Defendants.	§	
	§	

STIPULATION OF DISMISSAL AS TO GAVIN MCINNES ONLY

Plaintiffs and Gavin McInnes, Defendant, file this stipulation of dismissal under Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure.

1. Plaintiffs are Joel Vangheluwe and Jerome Vangheluwe. Defendants are GotNews L.L.C., Freedom Daily L.L.C., Charles C. Johnson, Alberto Waisman, Jeffrey Rainforth, Jim Hoft, David Petersen, Jonathan Spiel, Shirley Husar, Eduardo Doitteau, Lita Coulthart-Villanueva, Kenneth Strawn, Patrick Lehnhoff, Beth Eyestone, Lori Twohy, Raechel Hitchye, James Christopher Hastey, Christopher Jones, Connie Comeaux, Gavin McInnes, Richard Weikart and Paul Nehlen.
2. On February 14, 2018, Plaintiffs sued Defendants for defamation, defamation per se, intentional infliction of emotional distress, and invasion of privacy (false light).
3. Plaintiffs and Gavin McInnes have agreed to the dismissal of Gavin McInnes only as a defendant in this suit.
4. This case is not a class action under Fed. R. Civ. P. 23, a derivative action under Rule 23.1, or an action related to an unincorporated association under Rule 23.2
5. A receiver has not been appointed in this case.

6. This case is not governed by any federal statute that requires a court order for dismissal of this party.
7. Plaintiffs have not previously dismissed any federal or state court suit based on or including the same claims as those presented in this case.
8. This dismissal of Gavin McInnes only is with prejudice.
9. Plaintiffs and Defendant Gavin McInnes agree that all costs and attorneys' fees are the responsibility of the party incurring same.

Respectfully submitted,

**Sommerman, McCaffity & Quesada
L.L.P.**

/s/ Andrew B. Sommerman
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Attorney for Gavin McInnes

CERTIFICATE OF SERVICE

The undersigned certifies that on July 23, 2018, the foregoing Stipulation of Dismissal was served via ECF on counsel of record who have appeared in the case.

Furthermore, on July 23, 2018, I affirm that I placed true and accurate copies of this document in First Class postage-prepaid, properly addressed, and sealed envelopes which were addressed to: Lita Coulthart-Villanueva, [REDACTED] Jeffries St., Anderson, CA [REDACTED]; Kenneth G. Strawn, [REDACTED] Cypress Lane, Mission Viejo, CA [REDACTED]; and Jeffrey Rainforth, [REDACTED] H. St., Apt. [REDACTED], Sacramento, CA [REDACTED].

/s/ Andrew B. Sommerman
Andrew B. Sommerman